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May 18, 2011

*Enclosed Order:
Late filing excused
S/REG
USBJ
5/23/11*

Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 621
New York, NY 10004-1408

Re: *In re Motors Liquidation Company, et al., No. 09-50026 (REG)*
(Bankr. S.D.N.Y.)

Dear Judge Gerber:

As counsel for the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims, I write to explain, and apologize for, the late filing of our final fee application on May 17, 2011.

We were well aware of the May 16th due date for the submission of final fee applications and were working towards a timely submission when, at a very late stage, we encountered some difficulties in reconciling the figures presented in the draft application to amounts previously approved on an interim basis. This prompted us to go back through details of the draft with a fine-tooth comb. Rather than attempt a midnight filing on May 16th, we thought the goal of accuracy and reliability would be better served by taking an additional day. We did so and are confident of the data presented in the application as filed.

We apologize for our tardy filing and respectfully request Your Honor's indulgence.

Very truly yours,

A handwritten signature in blue ink that reads "Trevor W. Swett".
Trevor W. Swett

cc: Stephen Karotkin, Esq.
Thomas Moers Mayer, Esq.
Sander L. Esserman, Esq.
Timothy F. Nixon, Esq.
Andrew D. Velez-Rivera, Esq.

